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April 2 2009

Chip Humphrey
Eric Blischke
EPA Operations Office
805 S W Broadway Suite 500
Portland OR 97205

APR 3 2009

Environmental Cleanup Office

Re LWG GIS Tool Project Number 010142-01

Dear Chip and Eric

Please find attached the updated GIS Tool The tool includes some of the revisions that EPA requested at our GIS Tool check in meeting including

- 1 The GIS tool has been updated to provide the number of acres inside the lines representing background PRG and hilltop concentrations specified by the GIS tool user
- 2 Surface samples and core samples have been given different symbols with subsurface data available at the core locations. Sediment characterization using the natural neighbors analysis was still performed on surface data only.
- 3 The tool now has the capability to analyze sub areas of the river including the following sub areas
 - a 1-river mile segments
 - b East and west sides of the river excluding the navigation channel

At this time the LWG continues to consider the GIS fool to be a work in progress



One issue we currently are looking into is the role of elevated non-detect concentrations in the contouring. Because the GIS Tool uses the RI surface sediment data with the conventions for data processing set forth for the RA. It is possible for concentration contouring to be based on non-detect data and in some cases relatively high non-detects

EPA should be particularly aware that in these cases contouring may show areas of high concentration that are based primarily or entirely on non-detect data. This may occur in the case of chemicals expressed as total summations (e.g. total PCBs)

As the LWG moves forward with draft AOPC development in the coming months we will examine the issue further and for any maps created we will identify areas of high concentration contours that are not based on actual detected concentrations within the surface sediments. We will evaluate this issue and be prepared at the AOPC check in meeting to discuss instances of high non-detects and to explain their role in contouring efforts and subsequent discussions of AOPCs

Sincerely

Carl Stivers

Anchor QEA LLC

Attachment (DVD)